

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

YVONNE BARNES, PATRICIA DEAN,
ANTONIO MORRIS, and BERNADETTE
BOGDANOVS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

UNILEVER UNITED STATES,
INCORPORATED,

Defendant.

Case No. 1:21-cv-06191

Hon. Matthew F. Kennelly

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AGREEMENT**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Yvonne Barnes, Patricia Dean, Antonio Morris, and Bernadette Bogdanovs (“Plaintiffs”), individually, and on behalf of the Settlement Class¹, file their Unopposed Motion for Final Approval of Settlement Agreement. The Motion for Final Approval is set for a Final Approval Hearing on **September 13, 2024 at 9:00 a.m.**

In support of the Motion for Final Approval, Plaintiffs submit their Memorandum of Law in support; the Joint Declaration of Class Counsel; the Declaration of the Settlement Administrator, Stephen Weisbrot; and a proposed Final Approval Order.

For the reasons set forth in the Memorandum, Joint Declaration of Class Counsel; and the Declaration of the Settlement Administrator, Stephen Weisbrot, Plaintiffs respectfully request the Court: (i) grant Final Approval of the Settlement; (ii) certify for settlement purposes only the

¹ Unless otherwise stated, all defined terms herein have the meaning given to such terms in the Settlement Agreement and Releases.

Settlement Class, pursuant to Fed. R. Civ. P. 23(a) and (b)(3); (iii) appoint Plaintiffs as Class Representatives; (iv) appoint Class Counsel to represent the Settlement Class; (v) approve the notice provided to the class and (vi) enter the proposed Final Approval Order, dismissing the Action with prejudice.

Dated: June 28, 2024

Respectfully submitted,

By: /s/ Max S. Roberts
Max S. Roberts

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Class Counsel

CERTIFICATE OF SERVICE

I certify that on June 28, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Max S. Roberts
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